

File #26690

**STATE OF MINNESOTA
DEPARTMENT OF COMMERCE**

In the Matter of
World Transfer Title
and
Premium Properties Management

CEASE AND DESIST ORDER

TO: World Transfer Title
7015 4th Ave
Minneapolis MN 55415

Alleged Email Address: contact@worldtransfertitle.com

Premium Properties Management
211 North Robinson Ave., Suite 142
Oklahoma City OK 73102

Alleged Email Address: contact@premiumpropertiesmanagement.com

Minnesota law prohibits any person from acting or holding himself, herself or itself out as real estate licensees without a valid real estate license issued by the Commissioner of Commerce ("Commissioner") as required by Minn. Stat. §82.81, subd. 1 (2012). Minnesota law further prohibits any person from offering or selling an interest in subdivided land in this state unless the interest is registered pursuant to Minn. Stat. §83.23 subd. 1 (2012) or the transaction is exempt from registration pursuant to Minn. Stat. §83.25 (2012). Additionally, Minnesota law prohibits the advertising of properties in any manner that is misleading or inaccurate and the making of any material misrepresentations pursuant to Minn. Stat. §82.81 subd. 12(8) (9) and §325F.67 (2012).

1. Respondent World Transfer Title ("WTT") does not hold a license that is issued by the Minnesota Department of Commerce ("Department"). According to timeshare property owners that received documentation from WTT and were contacted by individuals purporting to represent WTT, WTT does business at 7015 4th Avenue, Minneapolis Minnesota USA 55415.

2. Respondent Premium Properties Management ("PPM") does not hold a license issued by the Department. According to documentation provided by timeshare property owners, PPM does business at 211 North Robinson Ave., Suite 142 Oklahoma City Oklahoma 73102.

3. In January 2013, the Department opened an investigation of WTT and PPM after receiving a complaint from M.C., a resident of California. M.C. was contacted by PPM and entered into a contract with PPM on 10/10/2012 for the sale of a timeshare ("Grand Bliss") they owned located in Puerto Vallarta, Mexico. PPM advised M.C. that WTT would act as PPM's escrow agent. M.C. received four (4) demands from WTT totaling \$16,123 that WTT represented was for the payment of "Mexican Government fees" necessary to transfer ownership of the timeshare. Wiring instructions provided by WTT, used an address for Bank of America in California with routing numbers and account information for international use. When M.C. attempted to cancel the transaction, M.C. was advised by WTT there was an additional charge of \$2,500 as a cancellation fee bringing the total amount sent by M.C. to \$18,623. WTT issued a letter of guarantee to M.C. in which it agreed to reimburse all funds M.C. paid; however, no funds have been received by M.C. M.C. recently informed the Department that M.C.'s phone calls are no longer being answered by either WTT or PPM. M.C. has filed police complaints in California and Oklahoma.

4. WTT's website, which is no longer active, was almost identical to the website of another title company advertising timeshare transfers, (Concord International Title using an address of 60 East 4th Street St. Paul Minnesota). Historical web pages for WTT list a business address of 7015 4th Ave. "Mineneapolis" Minnesota 55415 and *Minneapolis* is misspelled in several locations on the website. In addition to the misspelling of *Minneapolis*, the websites use the same stock photos and claim to manage over £3.3bn worth of property assets, work with over 380 resorts and leisure real estate developments and provide services to over 810,000 consumers worldwide. Additionally, the website for WTT states that it has "partnered businesses for over 20 years".

5. Using contact information provided on their websites, the Department attempted to contact WTT on March 20, 2013 and PPM on March 21, 2013 through the U.S. mail and by email to obtain information. Emails sent by the Department to WTT and PPM both bounced back as "delivery failed". The requests sent to WTT and PPM by U.S. mail were both returned as "Return to Sender No Such Number." No responses or information has been provided by either WTT or PPM.

6. WTT and PPM have conducted business within Minnesota without making legally required business filings with the Minnesota Secretary of State pursuant to Minn. Stat. Ch. 302A or Ch. 303.

7. PPM has not filed any legally required business filing with the Oklahoma Secretary of State.

8. PPM has engaged in unlicensed real estate sales activity in violation of Minn. Stat. §82.81 subd. 1 (2012).

9. WTT has engaged in unlicensed insurance producer activity by acting as a title company in violation of Minn. Stat. §60K.32 (2012).

10. WTT and PPM have engaged in misleading and inaccurate advertising in violation of Minn. Stat. §82.81 subd. 12 (8) and §325F.67 (2012).

11. WTT and PPM have made material misrepresentations in violation of Minn. Stat. §82.81 subd. 12 (9) (2012).

12. WTT has demonstrated untrustworthiness in violation of Minn. Stat. §82.82 subd 1(f) and §45.027 subd. 4 (2012).

This Order is in the public interest.

NOW, THEREFORE, IT IS HEREBY ORDERED, pursuant to Minn. Stat. §45.027 subd. 5a (2012) that WTT and PPM shall cease and desist from engaging in fraudulent activity and unlicensed activity of any kind in violation of Minn. Stat. Ch. 60K and 82. This Order is effective immediately.

Pursuant to Minn. Stat. §45.027 subd. 5a (2012), WTT and PPM may request a hearing in this matter. Such a request shall be made in writing and served upon the Commissioner. The Commissioner shall then set a date for hearing within 10 days after receipt of a request, unless WTT or PPM and the Department by agreement waive the 10-day time period. If no hearing is requested by WTT or PPM within thirty (30) days of service of this Order and none is ordered by the Commissioner, this Order will become permanent and will remain in effect until modified or vacated by the Commissioner.

In the event a hearing is requested, this Order will remain in effect until it is modified or vacated or made permanent by further order of the Commissioner under Minn. Stat. §45.027 subd 5a (2012). The administrative proceeding provided by Minn. Stat. §45.027

subd. 5a (2012) and subsequent appellate judicial review of that administrative proceeding, constitutes the exclusive remedy for determining whether the Commissioner properly issued this Order and whether this Order should be made permanent. The Commissioner reserves the right to seek appropriate remedies including fines, civil penalties and costs associated with our investigation of this matter.

Notwithstanding Minn. Stat. §45.027 subds. 5 or 5a (2012), if WTT or PPM requests a hearing under Minn. Stat. §45.027 subd. 5a (2012), WTT or PPM may, within fifteen (15) days after service of this Order, bring an action in Ramsey County District Court for an injunction to suspend enforcement of this Order pending a final decision of the Commissioner under Minn. Stat. §45.027 subd. 5a (2012), to vacate or make permanent this Order. The Court shall determine whether to issue such an injunction based on traditional principles of temporary relief.

In the event a hearing is requested in this matter, it will be held before an Administrative Law Judge to be appointed by the Chief Administrative Law Judge for the State of Minnesota, Office of Administrative Hearings, Harold E. Stassen Office Building, State Capitol Complex, 600 North Robert Street, St. Paul, Minnesota 55146. All parties have the right to represent themselves or be represented throughout the proceedings herein by legal counsel or a person of their choice if not otherwise prohibited as the unauthorized practice of law.


The contested case proceedings are conducted under the Minnesota Rules of Professional Conduct and the Professional Aspirations adopted by the Minnesota State Bar Association. The hearing will be conducted under the contested case procedures as prescribed

in accordance with Minn. Stat. Ch. 14 and the Rules of the Office of Administrative Hearings,
Minn. R. 1400.5100-1400.8401 (2011).

This Order shall be effective upon signature on behalf of the Commissioner.

Dated: 5-28-13.

By:



MIKE ROTHMAN
Commissioner

85 Seventh Place East, Suite 500
St. Paul, Minnesota 55101
Tel: 651-296-2488